TRANSMISSION VERIFICATION REPORT

NAME

: 05/14/2018 09:58

FAX

TEL

SER.# : BROJ6J624033

DATE, TIME FAX NO./NAME DURATION PAGE(S) MODE

05/14 09:50

00:08:34 19 OK STANDARD

DOES NOT CONTAIN NATIONAL SECURITY INFORMATION (E.O. 12065)

FAX TRANSMISSION

United States Environmental Protection Agency (USEPA) Office of Pollution Prevention & Toxics (OPPT) 1200 Pennsylvania Ave., NW Washington, D.C. 20460

Chemical Control Division (CCD) New Chemicals Management Branch (NCMB) Mail Stop 7405M

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FAX:

TOTAL PAGES: 19 including coversheet

TO: COMPANY: DATE: May 14, 2018

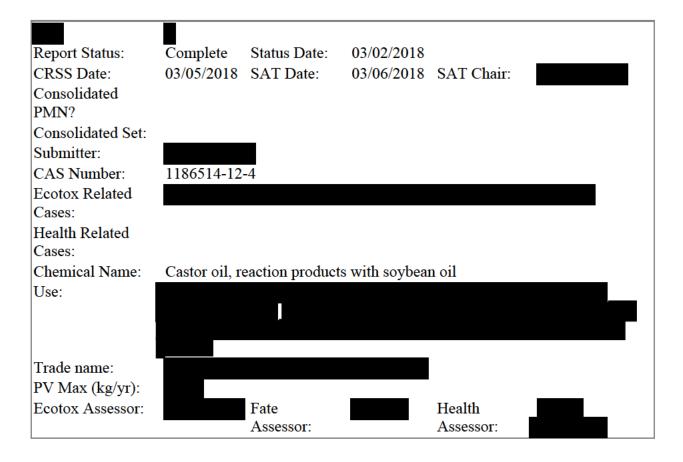
FROM: Gloria Odusote

Sanitized SAT and Engineering reports RE:

COMMENTS:

SAT Report for Case # P-18-0116

General



Physical Chemical Information

Molecular Weight: Physical State - Neat: Percent 500: Percent 1000: **Melting Point Melting Point** (Measured): (est): MP (EPI): Vapor Pressure: Vapor Pressure (est): VP (EPI): Water Solubility: Water Solubility (EST): Water Solubility (EPI): Log Kow: Log Kow (EPI): Log P: Log P Comment:

SAT Concern

Ecotox Rating (1): 3

Ecotox
Rating
Comment (1):

Ecotox Rating (2):

Ecotox
Rating
Comment (2):

Health Rating (1): 1

Health Rating (2):

Health Rating Comment (1):

Health Rating Comment (2):

PBT Ratings

Persistence	Bioaccumulation	Toxicity	Comments
2	1	1	

Exposure Based N
Review (Health)?
Exposure Based N
Review (Ecotox)?
SAT Keywords: Sens-U

Fate Assessment P-18-0116 Summary: FATE: Estimations for low weight mono-glyceride, log Kow =BP >H <log Koc = $\log \text{ Fish BCF} = 1.50 (32) (E)$ log Fish BAF = 1.17 (15) (E)POTW removal (%) = 90 via sorption and biodeg; OECD 301F(Mano Resp): MSDS (no study report, inherent biodegradation): Time for complete ultimate aerobic biodeg = wk Sorption to soils/sediments = moderate

PBT Potential: P2B1 *CEB FATE: Migration to ground water = slow Bioconcentration factor to be put into E-FAST: 15 PMN Material: Overall wastewater treatment removal is 90% via sorption and biodegradation. Sorption to sludge is strong based on the estimated physical-chemical properties from EPISUITE. Air Stripping (Volatilization to air) is negligible based on the estimated physical-chemical properties from EPISUITE. Removal by biodegradation in wastewater treatment is high based on measured data for the PMN substance (OECD 301F (Mano Resp): MSDS (no study report, inherent biodegradation): Destruction of the substance in wastewater treatment is complete based on measured data for the PMN substance (OECD 301F (Mano Resp): ; MSDS (no study report, inherent biodegradation): The aerobic aquatic biodegradation half-life is weeks based on measured data for the PMN substance (OECD 301F (Mano Resp): ; MSDS (no study report, inherent biodegradation): The anaerobic aquatic biodegradation half-life is months based on the estimated aerobic biodegradation half-life. The anaerobic biodegradation half-life is projected to be greater than or equal to the aerobic biodegradation half-life. Sorption to soil and sediment is moderate based on the estimated physicalchemical properties from EPISUITE. Migration to groundwater is slow, mitigated by biodegradation.

PMN Material:

	Moderate Persistence (P2) is based on the aerobic and anaerobic biodegradation half-life.
	Low Bioaccumulation potential (B1) is based on BCFBAF model estimates.
Removal in WWT/POTW (Overall):	Bioconcentration/Bioaccumulation factor to be put into E-Fast: 15.

Condition	Rating Values w/ Rating Description	Comment
WWT/POTW	3	
Sorption:	3	
WWT/POTW	4	
Stripping:	•	
Biodegradation	2	
Removal:	_	
Biodegradation	2	
Destruction:		
Aerobic Biodeg	2	
Ult:		
Aerobic Biodeg	2	
Prim:		
Anaerobic Biodeg	3	
Ult:		
Anaerobic Biodeg	3	
Prim:		
Hydrolysis (t1/2 at		
pH 7,25C) A:		
Hydrolysis (t1/2 at		
pH 7,25C) B:	_	
Sorption to	3	
Soils/Sediments:		
Migration to	2	
Ground Water:		
Photolysis A,		
Direct:		
Photolysis B, Indirect:		
muncet.		
1		

Condition	Rating Values w/ Rating Description	Comment
Atmospheric Ox A, OH:		
Atmospheric Ox B, O3:		

Health Assessment

Health Summary:	Absorption: Dermal is NIL to poor, Lung is poor, GI is moderate based on
	p-chem properties. There is uncertain concern for sensitizaition based an
	equivocal response in the LLNA study.
Routes of	Dermal Drinking Water Inhalation
Exposure:	

Test Data Submitted

Test Data Submitted:	PMN: Genotoxicity is negative with and without activation in salmonella and V79 cells. Oral LD50 > 2000 mg/kg, dermal LD50 > 2000 mg/kg,
Suomitted.	dermal irritation in rabbits is negative, eye irritation in rabbits is negative. In the LLNA study, the results were equivocal for sensitization, poorly dose
	responsive and didn't exceed the threshold stimulation index of 2.7. The stimulation indexes were 1.37, 1.51 and 1.58 at doses of 2%, 10% and 50%
	and an EC3 value is not possible to calculate.

Ecotox Assessment

Test	Test Type	Test	Predicted	Measured	Comments
organism		Endpoint			
Fish	96-h	LC50	1.1		
Daphnid	48-h	LC50	1.6		
Green Algae	96-h	EC50	0.44		
Fish	-	Chronic Value	0.04		
Daphnid	-	Chronic Value	0.49		
Green Algae	-	Chronic Value	0.28		

Factors	Most Sensitive Endpoint	Assessment Factor	СоС	Comment
Acute Acquatic:		4	110	
Chronic		10	4	
Acquatic:				

Ecotox Route of	All releases to water	
Exposure?		

Factors	Values	Comments
SARs:	Esters	
SAR Class:	Esters-poly	

Factors	Values	Comments
TSCA NCC	Esters	
Category?		

Recommended Testing

Ecotox Value Comments

Ecotox Factors Comments

Environmental hazard is relevant to whether a new chemical substance is likely to present unreasonable risks because the significance of the risk is dependent upon both the hazard (or toxicity) of the chemical substance and the extent of exposure to the substance. EPA estimated environmental hazard of this new chemical substance using the Ecological Structure Activity Relationships (ECOSAR) Predictive Model (https://www.epa.gov/tsca-screening-tools/ecological-structure-activity-relationships-ecosar-predictive-model) and hazard data on analogous chemicals. Based on these estimated hazard values from ECOSAR and hazard data on analogous chemicals, EPA concludes that this chemical substance is a high environmental hazard.

- · Substance falls within the TSCA New Chemicals Category of Esters.
- · ECOSAR chemical class of Esters-poly.
- · High hazard based on an acute COC of 110 ppb and chronic COC of 4 ppb base on predicted values from ECOSAR chemical class Esters, based on the LMW

Environmental Risks:

-Risks were not identified for ecotoxicity	
Testing Recommendations:	
-None	

PMN: 18-0116

Focus Ready Draft 3/22/2018

ENGINEER: Macek \ LMK \ JAS

PV (kg/yr): Import Only

SUBMITTER:

USE:

OTHER USES:

MSDS: Yes Label: No

INITIAL REVIEW ENGINEERING REPORT

TLV/PEL:

Gen Eqpt: Use local and general exhaust ventilation to control levels of exposure. Ensure gloves remain in good condition during use and replace if any deterioration is observed. Permeation resistant gloves. Chemical safety goggles or safety glasses with side-shields. Wear cloth work clothing including long pants and long-sleeved shirts.

Respirator: None required under normal conditions of use. Health Effects: May cause an allergic skin reaction.

CRSS :									
S-H20: VP: MW:					products	with	soybean	oil	
Physical	State	and Mis	sc CRS	SS Info:					
Neat:	Mf	g: NK:	Impor	t Proc/Fo	orm:				

Consumer Use: No
SAT (concerns) :

Related Cases and Misc SAT Info:

Analogs: Migration to groundwater: Slow

PBT rating: P2B1T

Health:

Eco: 2 Water (All releases to water with a CC = 4 ppb)

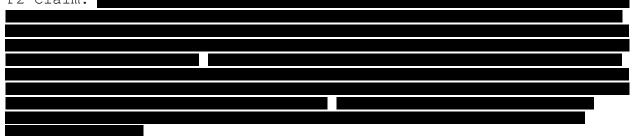
OCCUPATIONAL EXPOSURE RATING: 1B

NOTES & KEY ASSUMPTIONS:

Occupational exposure and environmental releases were estimated using the 9/30/2013 version of ChemSTEER tool. Input to ChemSTEER tool includes information from: the PMN submission, physical / chemical properties, and relevant past cases. This PMN is import only, therefore MFG is not assessed. The SAT report does not list concerns for health, but water releases are a concern (ppb=4) and migration to groundwater is slow. A full assessment was completed. // The following similar use past cases were referenced for consistency:

// PROC: This IRER assesses releases from equipment cleaning to uncertain media and from drum cleaning to landfill. It also assesses dermal exposures from unloading (consistent with all past cases).

POLLUTION PREVENTION CONSIDERATIONS: P2 Claim:



EXPOSURE-BASED REVIEW: No

INITIAL REVIEW ENGINEERING REPORT
PMN: 18-0116 USE: Intermediate
Number of Sites/ Location:
Days/yr:
Basis: The submission specifies RAD assumes operating days = exposure days. CS
calculates kg PMN/batch.
Process Description:
(per submission)
ENVIRONMENTAL RELEASES ESTIMATE SUMMARY
IRER Note: The daily releases listed for any source below may coincide with daily releases from the other sources to the same medium. Note, the submission indicates
•
Water or Incineration or Landfill Output 1:
basis: User-Defined Loss Rate Model. The submission does not estimate this release. Per March 2015 guidance on assessing releases of a chemical intermediate from reactor cleaning, RAD assumes 95-99% reaction, with 1% residual. Therefore,
RELEASE TOTAL
OCCUPATIONAL EXPOSURES ESTIMATE SUMMARY Tot. # of workers exposed via assessed routes:

Basis:

Inhalation:
negligible

Dermal:

Exposure to _____ concentration

High End:

> Potential Dose Rate: ______

> Lifetime Average Daily Dose: ______

> Average Daily Dose: ______

Number of workers (all sites) with dermal exposure: _____

Basis: ______

Per November 2016 RAD guidance, default parameters for this model were updated: body weight (BW) was updated from 70 to 80 kg and Averaging Time over a Lifetime (ATc) was updated from 70 to 78 years. |

INITIAL REVIEW ENGINEERING REPORT

PMN: 18-0116

Disposal:

Number of Sites/ Location: ■

Days/yr:

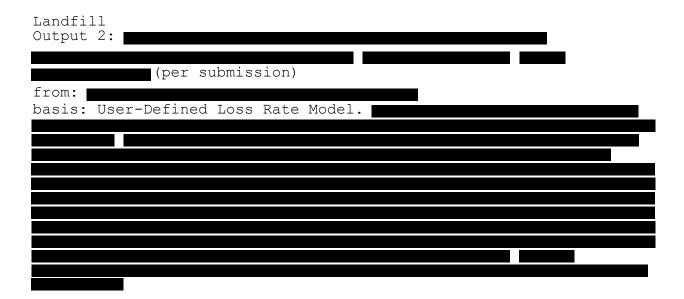
Basis: The submission identifies ■

Process Description:

ENVIRONMENTAL RELEASES ESTIMATE SUMMARY

IRER Note: The daily releases listed for any source below may coincide with daily releases from the other sources to the same medium.

Water Output	2:					·	
from:							
basis:							
							_



RELEASE TOTAL

OCCUPATIONAL EXPOSURES ESTIMATE SUMMARY
Tot. # of workers exposed via assessed routes:
Basis:

Inhalation:	:
-------------	---

negligible

Dermal:

from 70 to 78 years.

Exposure to

High End:

> Potential Dose Rate:

> Lifetime Average Daily Dose:

> Average Daily Dose:

Number of workers (all sites) with dermal exposure:

Basis:

Per November 2016 RAD guidance, default parameters for this model were updated: body weight (BW) was updated from 70 to 80 kg and Averaging Time over a Lifetime (ATc) was updated

MEMORANDUM of TELEPHONE CONVERSATION (Contains No TSCA CBI)

CALL BY:
Organization:

CALL TO:
Organization:

Date:
Time:

Phone:

Concerning what?

PMN: 18-0116